

THE LAW OFFICE OF
KEVIN MINTZER, P.C.
1350 BROADWAY, SUITE 1400
NEW YORK, NY 10018

KEVIN MINTZER

TEL: 646-843-8180
FAX: 646-478-9768
KM@MINTZERFIRM.COM

March 4, 2019

VIA ECF

Honorable Gregory H. Woods
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

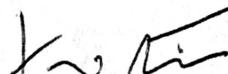
Re: Stajic v. City of New York et. al, No. 16 Civ. 1258 (GHW)

Dear Judge Woods:

I represent plaintiff Marina Stajic in the above matter, which is scheduled for trial on May 20, 2019. On Friday evening, March 1, 2019, plaintiff was served with defendants' motion *in limine*, seeking the complete or partial exclusion of 13 of the 15 live fact witnesses that plaintiff listed on the parties' proposed Joint Pre-Trial Order (Dkt. No. 151), as well as other relief. Under the Court's Individual Rules, plaintiff's response is presently due on March 8, 2019. Given the number of issues raised by defendants' motion and my other professional commitments this week, plaintiff respectfully requests an additional five days, until Wednesday, March 13, 2019, to submit plaintiff's opposition papers. Defendants have informed me that they consent to this request and seek an equivalent five-day extension to respond to plaintiff's motion *in limine*, which was also filed on March 1, 2019. Due to defense counsel's travel plans, defendants further seek until March 22, 2019, to file their reply papers in support of their motion *in limine*. Plaintiff consents to these requests. This is the first request from either side to extend these deadlines.

Accordingly, if the Court were to grant this application, the parties' *in limine* opposition papers would be due on March 13, 2019, plaintiff's reply papers in support of her motion *in limine* would be due by Monday, March 18, 2019, and defendants' reply papers in support of their motion *in limine* would be due March 22, 2019.

Respectfully submitted,



Kevin Mintzer

cc: Counsel of Record (via ECF)